

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA, §
§
Plaintiff, §
§
v. § Cause No. 18 CR 2945 WJ
§
SIRAJ IBN WAHHAJ, et al., §
§
Defendants. §

UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE MOTION

SIRAJ IBN WAHHAJ, Defendant, by and through his appointed counsel, Marc H. Robert and Thomas Clark, respectfully moves this Court for an extension of time to file a *Daubert* motion to exclude or limit the testimony of a proposed Government expert witness, and in support thereof would respectfully show the Court as follows:

1. Pursuant to the scheduling order entered by the Court on November 22, 2022 [Doc. 529], *Daubert* motions are due by Monday, May 1, 2023. The undersigned counsel is in the process of preparing and circulating such a motion.
2. The undersigned counsel will leave on Saturday, April 29 for a short trip to Washington state. Counsel will be back in the office on Thursday,

May 4, 2023. Counsel requests a short extension of the time for the filing of a *Daubert* motion, to Friday, May 5, 2023.

3. The undersigned counsel has conferred with Assistant United States Attorneys Kimberly Brawley and Tavo Jackson Hall regarding this request. The Government does not object to the requested extension.

WHEREFORE, SIRAJ IBN WAHHAJ , Defendant, respectfully requests this Court enter an Order extending the due date for Defendant's filing of a *Daubert* motion to Friday, May 5, 2023, and providing for such other and further relief to which the Court may find the parties to be justly entitled.

Respectfully Submitted,

/s/ Electronically filed on 4/28/23

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